

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
Norfolk Division

FLAME S.A.,

Plaintiff,

v.

Civil Action No.: 2:13cv658

INDUSTRIAL CARRIERS, INC.,  
VISTA SHIPPING, INC., and  
FREIGHT BULK PTE. LTD.,

Defendants.

**MOTION FOR ORDER OF ISSUANCE OF PROCESS  
OF MARITIME ATTACHMENT AND GARNISHMENT**

Plaintiff, Flame, S.A. (hereinafter, "Plaintiff"), by and through its attorneys, Crenshaw, Ware & Martin, P.L.C. and Blank Rome LLP (*pro hac vice applications pending*), hereby moves this Court, pursuant to Supplemental Rule B of the Federal Rules of Civil Procedure, for an Order that Process of Maritime Attachment and Garnishment be issued against all tangible and intangible property of Defendants, including, but not limited to, any property in which the Defendants have an interest, including, but not limited to, the vessel M/V CAPE VIEWER, any cargoes, cash, funds, escrow funds, debts, credits, wire transfers, electronic funds transfers, accounts, letters of credit, freights, sub-freights, charter hire, sub-charter hire, and/or any other assets of, belonging to, due or being transferred to, from, or for the benefit of any of the Defendants (hereinafter, "ASSETS"), including, but not limited to, such ASSETS as may be held, received, or transferred for their benefit at, through, or within the possession, custody, or control of banking institutions and/or other institutions and/or such other garnishee(s) on whom a copy of the Process of Maritime Attachment and Garnishment may be served, in the amount of

\$21,000,000.00 pursuant to Rule B of the Supplemental Rules for Certain Admiralty and Maritime Claims of the Federal Rules of Civil Procedure in respect to the claims against the Defendants, as identified in the Verified Complaint filed in this matter.

FLAME S.A.



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\* *Pro Hac Vice* application pending